<u>REMARKS</u>

Claims 1-4, 7-8, 10-12, 14, and 20-23 stand rejected under

35 U.S.C. 103(a) as allegedly being unpatentable over Sung et

al. U.S. Patent No. 6,226,684 (Sung) in view of Admitted Prior

Art (APA). This contention is respectfully traversed. To

establish a prima facie case of obviousness, three basic

criteria must be met: (1) there must be some suggestion or

motivation, either in the references themselves or in the

knowledge generally available to one of ordinary skill in the

art, to combine reference teachings, (2) there must be a

reasonable expectation of success, and (3) the combined prior

art references must teach or suggest all the claim limitations.

See MPEP 706.02(j).

The APA referred to is figure 1, and page 4, lines 3-10 of

the present specification. These portions of the present

specification describe a traditional distributed component

object model architecture, where reusable program building

blocks can be combined with one another in a distributed network

to form an application, provided that identifiers for the

reusable program building blocks, and a network name for a

server to provide any remote program building blocks, are known

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(i.e., this information is present on the client at the time of program object creation).

The present claims define systems and techniques whereby a client can generate activation requests to be fulfilled by a server, even if the client lacks information about any specific server that can process such requests. This allows client nodes to create remote components on available server nodes without monitoring the state of the network, where the remote components comprise reusable program building blocks that are combinable with one or more other components in a distributed network to form an application.

Sung teaches a method of "reestablishing connections between a particular client and a particular server by multiple routers." (See Sung at col. 13, lines 42-43.) Once a client is assigned to a particular server inside a server bank by a router, this assignment is saved for future use (in a "sticky" Internet Protocol (IP) cache table in the router), and this assignment of a client to a server is multicast to other routers in a collection of routers. Thus, when the client requests additional information from the server bank by sending a request to a router in the collection of routers at a later time, the same server in the server bank handles that information request,

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which can reduce excessive data caching in the server bank.
(See Abstract; col. 1, line 7 to col. 2, line 32; and col. 5,
lines 21-27.)

With respect to the first criteria necessary to establish a
prima facie case of obviousness, no effective suggestion or
motivation to combine APA with Sung has been identified, either
in the references themselves or in the knowledge generally
available to one of ordinary skill in the art. The proposed
motivation to combine is stated as follows: "because it would
have an efficient communications system that can reuse or share
a program with other components in the network servers."
However, attempting to implement a distributed component object
model architecture using Sung's techniques for reestablishing
connections between a particular client and a particular server
by using multiple routers, would in fact be a very inefficient
approach, and hence, one which would <u>not</u> be selected by one
having ordinary skill in the art for this reason.

Adding multiple routers, each with their own sticky IP
cache table, as taught by Sung, to a distributed component
object model architecture would add <u>complexity and inefficiency</u>
to the architecture without any apparent corresponding benefit.
The clients in such a combination would still need to have

stored a network address for at least one of the routers before

a program object, which corresponds to a remote component

provided by one of the servers, could be created.

Moreover, even if the hypothetical combination of Sung and

APA were made, this combination would still not teach or suggest

all the claim limitations.

Independent claim 1 requires a server node operating to

enable the client node to activate remote components on

available server nodes without specific names or capabilities of

nodes in the network servicing the requests as claimed. As

described above, nothing in Sung in view of APA teaches or

suggests this feature.

With respect to claim 23, the hypothetical combination

would not result in client·nodes configured to be able to

request activation of remote components at run-time without

specific names or capabilities of nodes servicing those requests

as claimed. If the proposed combination of Sung and APA could

be made to enable a client node to activate remote components

without specific names or capabilities of nodes servicing those

requests, it would be the routers and not the servers or clients

that would provide such flexibility, due to the very nature of

the invention in Sung.

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With respect to independent claims 7, 14, 20 and 22, the proposed combination would not teach or suggest multicasting a machine-independent activation request to the network as claimed. The multicasting taught by Sung involves multicasting from one router to other routers information indicating the assignment of a client to a server. (See col. 2, lines 14-16; and col. 11, lines 31-42.) With respect to independent claims 10 and 21, the proposed combination would not teach or suggest monitoring, at a server, a specific port to receive a machine-independent client activation request. The server port referred to in Sung is used for all communications from the client.
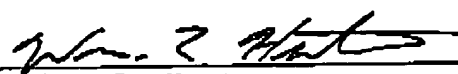
For all of these reasons, it is respectfully suggested that a prima facie case of obviousness has not been established. Thus, it is respectfully suggested that independent claims 1, 7, 10, 14, and 20-22 should be allowable. Dependent claims 2-4, 8, and 11-12 are patentable based on the above arguments and their own merits. Therefore, it is respectfully suggested that all pending claims, 1-4, 7-8, 10-12, 14, and 20-23, are now in full condition for allowance, and an official notice of allowance is requested to issue at an early date.

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Respectfully submitted,

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